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RECEIVED

August 6, 1993

AUG 11 1993

FCC MAIL ROOM

Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

RE: RM-8280

Dear Sir:

I enclose here for filing an original and four copies of the American Digital Radio Society's reply to the comments filed in this proceeding by the American Radio Relay League.

Yours truly,


Warren J. Sinsheimer

Enclosures

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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AUG 11 1993

In the Matter of)
Revision of Part 97 of the Rules)
Governing the Amateur Radio)
Services Concerning High-Frequency)
Data Communications)

RM-8289 ECG MAIL ROOM

To: The Commission

REPLY

The American Digital Radio Society
c/o Warren J. Sinsheimer
30 Rockefeller Plaza - 35th Floor
New York, NY 10112

August 6, 1993

Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matter of)
Revision of Part 97 of the Rules)
Governing the Amateur Radio)
Services Concerning High-Frequency)
Data Communications)

RM-8280

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AUG 11 1993

To: The Commission:

FCC MAIL ROOM

REPLY OF THE AMERICAN DIGITAL RADIO SOCIETY
TO COMMENTS OF THE AMERICAN RADIO RELAY LEAGUE

The American Digital Radio Society ("Society"), a not-for-profit corporation, all of whose members are amateurs licensed by the Commission, hereby respectfully submits its reply to the comments of one of the other national associations of radio amateurs, The American Radio Relay League ("ARRL"). This reply is made despite the fact that on the face of the Comments the ARRL states that the Comments "are not principally addressed to the proposals contained in the . . . petition."¹ It appears that the ARRL has chosen to support the Petition by attempting to amend their Petition RM-8218 by the unusual means of commenting on another organization's petition. Except for a reference to the Society's petition in this footnote and a passing reference to the petition to establish the timeliness of the ARRL comments, the Society's petition is not mentioned. The Society submits to the Commission that while the Comments may be timely, they are irrelevant to this proceeding.

¹ARRL Comments, dated July 30, 1993, p. 1, note 1.

the Commission to disregard them in their entirety.

I. Introduction: RM-8280

1. The Society's Petition for Rule Making, RM-8280, filed June 2, 1993 proposed that "unattended semi-automatic" operation in digital modes be permitted at HF anywhere that digital operation is permitted. The term "unattended semi-automatic" operation was defined in the petition and is well understood by the entire amateur digital community. It was, and is, irrelevant that the ARRL chooses not to recognize a term in such wide general use by its members and committees. The Society is well aware that the Rules do not use the term "unattended semi-automatic operation." Its purpose in filing its Petition for Rule Making was to incorporate the concept of such operation into the Rules. However, if the ARRL is happier not using that designation, the Society has no objection. The Rules can call the "semi-automatic" operation whatever the Commission deems appropriate.

The purpose of the Society in filing the Petition was that it had grave misgivings over the content of the ARRL petition². Many of its members opposed the concept of confining automatic digital communications to set sub-bands. Others objected to fully automatic operations at all HF. However, it was decided by the Board of the Society not to actively oppose the ARRL petition, but, rather to petition the Commission to authorize "unattended semi-automatic" operations at HF on any frequency on which digital communications are permitted.

²RM 8218

2. The Society recognized how divided the Amateur community is on the subject of Automatic operation. The survey referred to in the petition of the ARRL³ has been subject to varying interpretations, but it is very clear from the survey results that a clear majority of the respondents to the survey opposed any unattended automatic operation in the HF bands. Nevertheless, in order that there should not be a rift between the majority of the digital community and the ARRL, the Society decided not to actively oppose RM 8218.

3. The Society's position with respect to "unattended semi-automatic operation" was vindicated, when, once again, the ARRL's own digital Committee recommended to the Board of the ARRL that they approve the concept of "unattended semi-automatic operation."

4. The Society's position was further bolstered when the Board of the ARRL directed its General Counsel to file comments to this petition, endorsing the recommendations contained in the report of its digital committee.⁴

II. NECESSITY FOR REPLY

1. Under normal circumstance this reply would have not been necessary. On the face of the Comments, the ARRL has fully supported the Society's position with respect to "unattended semi-automatic operation." In fact, at the meeting of the Board

³RM-8218

⁴A copy of this report was appended to the Supplemental Comments of the Society in respect of RM-8218.

of Directors of the Society held in Tarrytown, NY on July 24, 1993, the Board passed a resolution commending the ARRL for its support of the Society's petition. That was prior to the filing by the ARRL of its comments in this proceeding.

2. As the Society stated in its Petition, the proposal of the ARRL to authorize fully-automatic unattended operation represents a clear departure from past practices.⁵ The Petition further pointed out that a clear majority of respondents to the ARRL survey opposed unattended fully-automatic operations in the HF Bands⁶. Nonetheless, the ARRL seeks to have such operations authorized by Part 97. We can only surmise that the STA operators' objections to the earlier ARRL position caused this change of heart.

3. In its Comments the ARRL states that ". . . certain digital modes, such as packet, which are not compatible with other modes . . . require separate frequencies."⁷ The Society disagrees! If we were to carry that thinking to its dryly illogical conclusion, the amateur bands would be totally fragmented and chaotic. If the purpose of the ARRL comments was to convince the Commission that HF Packet has to be protected from newer technologies, then the Society opposes the creation of the sub-bands as suggested by the ARRL petition, and consequently, the authorization of unattended fully automatic

⁵RM-8280, p.8.

⁶Ibid.

⁷Reply of the ARRL, p3.

operations at HF.

4. Finally, this Reply has been necessitated by the blatant attempt of the ARRL to arrogate authority with respect to the allocation of HF spectrum. The ARRL Comments refer to the recent adoption of the IARU bandplan for data communication in Region 2⁸. The comments do not point out that the IARU plan wipes out part of the Novice CW segment on 40 meters and invades the RTTY segment on 15 and 20 meters. The comments further do not refer to the complete lack of coordination with the IARU with respect to other modes. The ARRL seems to be asking the Commission to codify into the laws of the United States, the agreement of private organizations who represent but a small fraction of the licensed Amateurs. Further, the Comments of the ARRL refer to compliance with "necessary voluntary bandplans"⁹ and to the threat/promise of the ARRL to continue to monitor the level of compliance and to "initiate appropriate action should there be a lack of compliance."¹⁰ The Amateur community has always created voluntary sub-bands. Even at this early stage, the newer technologies have found a way to live with each other. The stations using Clover started operations on a number of frequencies that had been traditionally used by other RTTY modes for DX and other operations. Within two weeks the problem had been solved without the intervention of either the FCC or the

⁸ARRL Comments note 2, p.3.

⁹op cit p8

¹⁰Ibid.

ARRL. As the Society pointed out in its Petition, the use of voluntary sub-bands is largely self regulating."

CONCLUSION

It is apparent that the entire Amateur community is in favor of what they call "unattended semi-automatic operation." It is also evident that there is no such unanimity with respect to fully automatic operation, if it exists only for the preservation of HF packet.

The Society respectfully request that the Commission issue a Notice of Proposed Rule Making at an early date proposing the rule changes proposed by the Society in RM-8280.

Respectfully submitted,

The American Digital Radio Society

By: 
Warren J. Sinsheimer

¹¹op cit p5.